

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-80007-LEIBOWITZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL SHAPIRO,

Defendant.

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UNOPPOSED MOTION FOR TRAVEL COSTS

The defendant, Michael Shapiro, through undersigned counsel, respectfully submits this Motion for Travel Costs to return to the Southern District of Florida for court in the instant case, pursuant to 18 U.S.C. § 4285, and states the following in support:

Mr. Shapiro is alleged to have committed various law violations in the Eastern District of Michigan. (*United States v. Michael Shapiro*, 24-CR-20099-JJCJ-KGA, DE 1 (E.D. Mich. Feb. 28, 2024). On March 5, 2024, Mr. Shapiro made his initial appearance in the Southern District of Florida (“S.D. Fla.”). (DE 2). He was later released on a personal surety bond. (DEs 3-4). Mr. Shapiro currently resides in the Southern District of Florida. (DE 3). Because Mr. Shapiro is indigent, the Federal Public Defender’s Office was appointed to represent him in both cases. (DE 2, 24-CR-

80007 (DE 8)). As such, Mr. Shaprio is indigent and is unable to pay for his transportation to and from the E.D. Michigan. Therefore, Judge McCabe issued an order in the removal case to Michigan directing the U.S. Marshals to arrange for Mr. Shapiro's noncustodial transportation and subsistence expenses from West Palm Beach, Florida to the E.D. of Michigan (Detroit, Michigan) for his court hearing on March 19, 2024, pursuant to 18 U.S.C. § 4285. (DE 6). Mr. Shapiro now requests this Court to issue an order directing the U.S. Marshals to arrange for Mr. Shapiro's noncustodial transportation and subsistence expenses from the E.D. of Michigan, after his 1:00 hearing on March 19, 2024, and back to West Palm Beach, FL for future court hearing(s) in this case, pursuant to 18 U.S.C. § 4285.

Title 18 U.S.C. § 4285 permits any judge or magistrate judge of the United States to direct the U.S. Marshal to arrange for the noncustodial transportation or furnish the fare for such transportation of a defendant released on bond to the place where his appearance is required, when satisfied the defendant is unable to provide the necessary transportation to appear before the required court on his own. 18 U.S.C. § 4285.

Undersigned counsel conferred with Assistant United States Attorney Mark Dispoto who advised that the government had no objection to this motion.

Wherefore, Mr. Shapiro respectfully requests the Court direct the U.S. Marshals to provide for Mr. Shapiro's noncustodial transportation from the E.D. of Michigan on March 19, 2024 after his 1:00 court hearing or immediately thereafter

to West Palm Beach, Florida for his future court appearances in the Southern District of Florida and an amount of money for subsistence expenses to his destination, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code.

Respectfully submitted,

HECTOR A. DOPICO
Interim Federal Public Defender

s/ *Kristy Militello*

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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ *Kristy Militello*

Kristy Militello